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February 15, 2008

Via ECF and Regular Mail

Honorable Richard M. Berman

United States District Court

Southern District of New York

500 Pearl Street

New York, NY 10007-1312

**Re: Pure Tech Systems v. Kemper Environmental Ltd. and
Kemper Indemnity Insurance Company
07-CIV-7065 (RMB)**

Dear Judge Berman:

We represent defendants in the above matter. Discovery is due to close on March 3, 2008 at which time the parties are to appear before the Court. We write in further supplement and support of plaintiff's counsel's request for an additional 90 days discovery.

On February 13th we received by email, responses and objections to defendants' First Set of Interrogatories and First Request for Production of Documents. I spoke with plaintiff's counsel upon receipt of that email and was advised that 11 boxes of documents were sent by overnight mail. They arrived on February 14, 2008.

Under the circumstances, it is respectfully requested that the Court extend the discovery cutoff for a period of 90 days given the extensive volume of materials and the complexity of this litigation.

Respectfully submitted,


David M. Pollack

DMP/cm

cc: Vinjanyant Pawar, Esq.

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